

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENVILLE**

UNITED STATES OF AMERICA

v.

No. 2:09-CR-045

RONNIE COOPER

**AFFIDAVIT OF LOIS COLLEY
IN SUPPORT OF RONNIE COOPER'S
MOTION TO VACATE, SET ASIDE, OR CORRECT SENTENCE
PURSUANT TO 28 U.S.C. § 2255**

STATE OF OHIO)
) ss.
COUNTY OF FRANKLIN)

I, Lois Colley, declare under penalty of perjury that the following facts are true and correct to the best of my personal knowledge.

1. I am a private investigator employed by M&A Profilers, Inc, a research and investigative firm that I founded in 1987. I am licensed as a private investigator in the state of South Carolina.

2. I have been a private investigator for approximately 28 years. During my career, I have worked on a variety of cases, including a number of criminal investigations.

3. I have been retained by the Mintz Group to assist with its investigation in connection with Ronnie Cooper's case.

4. On October 10, 2015, I attempted to locate Jamie Lavon Rush at his aunt's home in South Carolina. Although I did not find Mr. Rush, I left a message with his neighbors, who ultimately put me in touch with Mr. Rush via telephone.

5. During our telephone call, Mr. Rush told me that Mr. Cooper was not involved with Sunnah Maddox's drug operation. He also told me that he had conveyed this information to the law enforcement officers who had questioned him prior to trial.

6. On October 26, 2015, Clancy Nolan of the Mintz Group and I interviewed Mr. Rush in person at a Buffalo Wild Wings in Columbia, South Carolina. The interview lasted approximately two hours.

7. During this interview, Mr. Rush reiterated what he had told me in our October 10, 2015 telephone call. Specifically, Mr. Rush told us that Mr. Cooper was never involved with Sunnah Maddox's drug operation.

8. Mr. Rush also told us that that he met with law enforcement officials on a number of occasions prior to testifying at trial and was asked questions about Mr. Cooper's involvement with Sunnah Maddox's drug operation. In response to all such questions, Mr. Rush informed the law enforcement officials that Mr. Cooper was not at all involved. Mr. Rush could not recall which specific individual or individuals he provided with this information.

9. Mr. Rush was aware that Sunnah Maddox had told Mr. Cooper that there was a "green light" on Mr. Rush, but Mr. Rush was never concerned that either Mr. Cooper or Sunnah Maddox would try to harm him. This was based partially on his understanding that Mr. Cooper was not involved with any criminal activity. It was also

based on Mr. Rush's knowledge that Sunnah Maddox was full of hot air and frequently made brash statements that were never acted upon.

10. Mr. Rush told us that he felt that Mr. Cooper had gotten a "raw deal." He said that, since Mr. Cooper's only connection was that he was married to Sunnah Maddox's sister, it was unfortunate that Mr. Cooper had been lumped in with the members of the drug conspiracy.

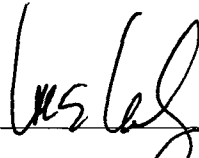
11. In my opinion, Mr. Rush told us the truth about Mr. Cooper. Mr. Rush was extremely forthcoming and seemed interested in helping to correct the injustice of Mr. Cooper's conviction. However, Mr. Rush was also concerned about any possibility that his assistance might have negative repercussions for him.

12. Mr. Rush told us that he would consider signing an affidavit regarding the statements he made to law enforcement officials regarding Mr. Cooper. Given his concerns, however, Mr. Rush told us that he needed to speak with his probation officer in order to obtain her permission before signing any affidavit.

* * *

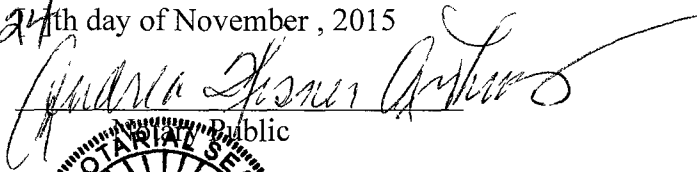
I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.

Dated: Columbus, Ohio
November 24, 2015



Lois Colley

Sworn to before me this
24th day of November, 2015



Public



Andrea Wisner Arthurs
Notary Public, State of Ohio
My Commission Expires 10-17-2018

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Jaren Janghorbani

Jaren Janghorbani

Paul, Weiss, Rifkind, Wharton & Garrison LLP